

March 8, 2012

Douglas H. Shulman  
Commissioner  
Internal Revenue Service  
1111 Constitution Ave., N.W.  
Washington, DC 20224

Re: Complaint Against Americans for Job Security

Dear Commissioner Shulman:

Citizens for Responsibility and Ethics in Washington (“CREW”) respectfully requests an Internal Revenue Service (“IRS”) investigation into whether Americans for Job Security (“AJS”), a non-profit organization exempt from taxation pursuant to section 501(c)(6) of the Internal Revenue Code (“Code”), is operating with the primary purpose of influencing political campaigns in violation of the Code.<sup>1</sup>

Section 501(c)(6) provides tax-exempt status to “business leagues, chambers of commerce, real-estate boards, boards of trade, or professional football leagues . . . not organized for profit.”<sup>2</sup> The primary purpose or activity of section 501(c)(6) organizations such as AJS may not be political campaign activity.<sup>3</sup> The Code does not state precisely what constitutes political activity, but some activities unquestionably are political, such as explicitly advocating the election or defeat of a candidate for public office.<sup>4</sup> For other activities, the IRS applies a facts and circumstances test to determine whether an organization has participated in a political campaign.<sup>5</sup>

In 2010, AJS spent more than 72 percent of its expenditures on political campaign activities, clearly making it AJS’s primary activity. As a result, AJS violated its tax-exempt status under section 501(c)(6). Because of the serious nature of the tax law violations, the IRS should revoke AJS’s tax-exempt status and/or impose appropriate excise taxes and penalties on the organization.

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<sup>1</sup> CREW submits this letter in lieu of Form 13909; a copy is being sent to the Dallas office.

<sup>2</sup> 26 U.S.C. § 501(c)(6).

<sup>3</sup> G.C.M. 34,233 (“if the primary purpose or activity of an organization is to engage in political action, then we believe it is not organized primarily as a business league and cannot qualify for exemption under section 501(c)(6)”); Election Year Issues, 2002 EO CPE Text at 433.

<sup>4</sup> Rev. Rul. 2004-6; Election Year Issues, 2002 EO CPE Text at 349, 388.

<sup>5</sup> Rev. Rul. 2007-41; Rev. Rul. 2004-06.

### **Americans for Job Security's Political Activity**

AJS has long participated in political campaigns. Based on this political activity, CREW previously filed a complaint with the IRS against AJS in 2004, as did Public Citizen in 2007.<sup>6</sup> In addition, several complaints have been filed against AJS with the Federal Election Commission ("FEC") regarding its political activities,<sup>7</sup> and the Alaska Public Offices Commission found AJS violated state campaign finance law by acting as a pass-through for political contributions.<sup>8</sup>

In 2010, AJS again spent extensively on political campaign activity. According to reports AJS submitted under penalty of perjury to the FEC, the group spent \$8,971,043 on reportable activities in the year preceding October 31, 2010, the end of AJS's fiscal year.<sup>9</sup> Specifically, through October 31, 2010, AJS spent \$4,414,524 on independent expenditures expressly advocating the election or defeat of candidates, and \$4,556,519 on electioneering communications - broadcast advertisements that clearly identify a candidate close to an election.

AJS's independent expenditures unquestionably constituted political activity. For example, AJS spent \$464,795 on advertisements telling voters to "vote against" Rep. Rick Boucher (D-VA), and another \$472,220 on advertisements telling voters to "vote against" Rep. Michael Arcuri (D-NY).<sup>10</sup> AJS's other advertisements reported to the FEC as independent

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<sup>6</sup> See <http://www.citizensforethics.org/press/entry/crew-files-irs-complaint-against-multiple-501c-political-organizations> (CREW complaint); <http://www.citizen.org/documents/AJS%20Complaint.pdf> (Public Citizen complaint).

<sup>7</sup> See, e.g., Federal Election Commission, First General Counsel's Report, MURs 5694 and 5910, February 6, 2008 (available at: <http://eqs.nictusa.com/eqsdocsMUR/10044273664.pdf>).

<sup>8</sup> *Pebble Limited Partnership, et al. v. Renewable Resources Coalition, Inc., et al.*, Alaska Public Offices Commission, Staff Report, Case No. 09-01-CD, June 4, 2009 (available at: <http://alaskamag.com/resources/pdf/pebblemine100301/APOCreport.pdf>); see also Mike McIntire, *Hidden Under Tax-Exempt Cloak, Political Dollars Flow*, *New York Times*, September 23, 2010 (attached as Exhibit A).

<sup>9</sup> See <http://query.nictusa.com/cgi-bin/fecimg/?C90011669> (FEC reports of independent expenditures); <http://query.nictusa.com/cgi-bin/fecimg/?C30001135> (FEC reports of electioneering communications); AJS 2009 Form 990, at 1 (covering November 1, 2009 through October 31, 2010) (attached as Exhibit B).

<sup>10</sup> Americans for Job Security, *FEC Form 5, October Quarterly Report*, October 15, 2010; Americans for Job Security, *FEC Form 5, Year End Report*, January 31, 2011; [http://www.youtube.com/watch?v=Ng3e6Kx2CyA&feature=player\\_embedded](http://www.youtube.com/watch?v=Ng3e6Kx2CyA&feature=player_embedded); [http://www.youtube.com/watch?v=NY88S-k74y0&feature=player\\_embedded](http://www.youtube.com/watch?v=NY88S-k74y0&feature=player_embedded);

expenditures similarly told voters to oppose the election of identified candidates.<sup>11</sup> AJS's Form 990 tax return acknowledged the group spent \$4,351,478 on political campaign activity through October 31, 2010.<sup>12</sup> AJS asserted this reflects its independent expenditures for mailings and television advertisements, although the amount it reported to the FEC is not identical to that on its Form 990.<sup>13</sup>

The more than \$4.5 million AJS reported to the FEC it spent on electioneering communications also constitutes political activity. While these advertisements stop short of expressly advocating the election or defeat of candidates, they represent political campaign intervention under IRS authority. In Revenue Ruling 2007-41, the IRS promulgated guidance on the distinction between issue advocacy and political campaign intervention.<sup>14</sup> The IRS takes into consideration all the facts and circumstances of a particular communication, and identified the key factors as: (1) whether the statement identifies one or more candidates; (2) whether the statement expresses approval or disapproval for a candidate's position; (3) whether the statement is delivered close to an election; (4) whether the statement makes reference to voting or an election; (5) whether the issue addressed has been raised as an issue distinguishing candidates for an office; (6) whether the communication is part of an ongoing series of communications by the organization on the issue that are made independent of the timing of any election; and (7) whether the timing of the communication is related to a non-electoral event such as a scheduled vote on specific legislation by an officeholder running in an election.<sup>15</sup> Applying these factors, all of the electioneering communications advertisements AJS broadcast in 2010 constitute political campaign participation.

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[http://www.youtube.com/watch?v=Pqgy7vAqenI&feature=player\\_embedded](http://www.youtube.com/watch?v=Pqgy7vAqenI&feature=player_embedded);  
[http://www.youtube.com/watch?v=ZUTvHF3se0k&feature=player\\_embedded](http://www.youtube.com/watch?v=ZUTvHF3se0k&feature=player_embedded).

<sup>11</sup> Most of these advertisements are available on AJS's website, <http://www.savejobs.org/mediacenter.php>, or at AJS's YouTube channel, <http://www.youtube.com/user/ajssavejobs>.

<sup>12</sup> AJS 2009 Form 990, Schedule C, Part I-A.

<sup>13</sup> AJS 2009 Form 990, Schedule C, Part IV.

<sup>14</sup> While Revenue Ruling 2007-41 addresses political activity by section 501(c)(3) organizations (which may not participate at all in political campaigns), the IRS applies the ruling's analysis to determine if the activities of other section 501(c) organizations are political. *See, e.g., Frances R. Hill, Exempt Organizations in the 2008 Election: Will Wisconsin Right to Life Bring Changes?*, 19 U. Fla. J.L. & Pub. Pol'y 271, 284 (2008).

<sup>15</sup> Rev. Rul. 2007-41.

For example, AJS reported spending \$980,256 on October 20, 2010 to produce and broadcast an advertisement asserting now-Sen. Joe Manchin (D-WV) supported President Obama's stimulus plan "that wasted money on turtle tunnels, ant research, and cocaine for monkeys," as well as other projects.<sup>16</sup> The advertisement then encouraged viewers to "tell Obama and Manchin not to stimulate us any more." The advertisement could not have been "related to a non-electoral event such as a scheduled vote on specific legislation by an officeholder running in an election" for the simple reason that Mr. Manchin at the time was the governor of West Virginia, and thus could not vote on any federal legislation.<sup>17</sup> Nor were there votes in Congress scheduled at the time on any stimulus or jobs bills as Congress went into recess at the end of September.<sup>18</sup> The advertisement also identified Mr. Manchin, expressed disapproval for his supposed position on the stimulus bill, was broadcast very close to the election, does not appear to have been part of any ongoing series of communications by AJS independent of the election, and addressed an issue that distinguished Mr. Manchin from his opponent.<sup>19</sup>

AJS also reported spending \$585,800 to produce and broadcast an advertisement against Jane Norton, Colorado's former lieutenant governor, in her race against Weld County District Attorney Ken Buck for the Republican nomination for a U.S. Senate in Colorado.<sup>20</sup> The advertisement linked Ms. Norton to President Obama and Sen. Michael Bennet (D-CO), said her "talk is cheap" regarding spending, taxation, and regulation, and asserted she "pushed the largest tax hike in Colorado history" and managed a surge in government spending.<sup>21</sup> The advertisement then told viewers to "tell Jane Norton no more high taxes and spending," and provided the phone number of her campaign headquarters.<sup>22</sup> As with the advertisement against Mr. Manchin, this advertisement - broadcast a few weeks before the August 10, 2010 primary election - could not

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<sup>16</sup> See <http://politicalcorrection.org/adcheck/201010250008>.

<sup>17</sup> *Id.*

<sup>18</sup> David M. Herszenhorn, [Congress Wraps Up Session Early as Midterm Races Loom](#), *New York Times*, September 30, 2010 (attached as Exhibit C).

<sup>19</sup> Ry Rivard, [Raese, Manchin Clash on Stimulus](#), *Charleston Daily Mail*, September 20, 2010 (attached as Exhibit D).

<sup>20</sup> Americans for Job Security, [FEC Form 9, 24 Hour Notice of Disbursements/Obligations for Electioneering Communications](#), July 28, 2010.

<sup>21</sup> See <http://www.youtube.com/watch?v=BF-4Bz9wRwE&feature=plcp&context=C3af1dbbUDOEgsToPDskJddafQ2yQc1Vz29Xywjut6>.

<sup>22</sup> *Id.*

have been related to a non-electoral event because Ms. Norton did not hold any public office at the time.<sup>23</sup> It also identified Ms. Norton, expressed disapproval for her positions, was broadcast very close to the election, does not appear to have been part of any ongoing series of communications by AJS independent of the election, and addressed an issue that distinguished Ms. Norton from her opponent.

AJS's other advertisements reported to the FEC as electioneering communications similarly identified a candidate, expressed approval or disapproval for the candidate's supposed position, were unrelated to a non-electoral event such as a scheduled vote on specific legislation, were broadcast close to an election, do not appear to have been part of any ongoing series of communications by AJS independent of an election, and addressed issues that distinguished the candidate from his or her opponent.<sup>24</sup>

All of these advertisements are similar to the hypothetical situation analyzed in Situation 15 of Revenue Ruling 2007-41, in which an organization broadcast an advertisement identifying an officeholder shortly before an election that was not part of an ongoing series of similar communications on the same issue, was not timed to coincide with a non-election event, and took a position on an issue that distinguished the officeholder from his or her opponent.<sup>25</sup> Such advertisements, the IRS concluded, constitute political campaign intervention.<sup>26</sup> Accordingly, all \$8,971,043 AJS reported to the FEC it spent on independent expenditures and electioneering communications constitutes political campaign activity.

For AJS's fiscal year that ended October 31, 2010, AJS spent a total of \$12,417,809, according its Form 990.<sup>27</sup> As a result, 72.2 percent of AJS's total expenditures for that fiscal year were for political campaign activity.

The IRS has not established what amount of political activity a section 501(c)(6) organization may engage in before it becomes the organization's "primary" purpose or activity. Under any rational definition of "primary," an activity that consumes 72.2 percent of an organization's expenditures constitutes its "primary" activity. AJS's primary purpose and

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<sup>23</sup> Alison Sherry, Buck Defeats Norton In Bruising GOP Primary For Senate Seat, *Denver Post*, August 11, 2010 (attached as Exhibit E).

<sup>24</sup> See <http://www.savejobs.org/mediacenter.php>; <http://www.youtube.com/user/ajssavejobs>.

<sup>25</sup> Rev. Rul. 2007-41.

<sup>26</sup> *Id.*

<sup>27</sup> AJS 2009 Form 990, Part IX.

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primary activity clearly is political campaign activity, in violation of its status as a section 501(c)(6) tax-exempt organization.

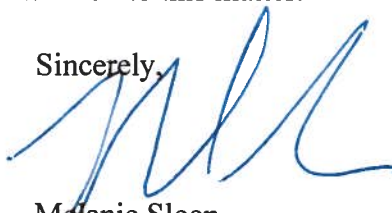
### Conclusion

Based on the publicly available information, it appears AJS's activities during the 2010 election cycle do not comport with its status as a section 501(c)(6) tax-exempt organization. Therefore, the IRS should investigate AJS and, should it find that AJS has violated its tax-exempt status, take appropriate action, which may include revoking its section 501(c)(6) status, imposing any applicable excise taxes under section 4958 for excess benefit transactions, and treating AJS as a taxable corporation or as a section 527 organization.

In 2010 and 2011, CREW and others filed complaints with the IRS against groups that have engaged in impermissible political activity in violation of their tax-exempt status.<sup>28</sup> These and other tax-exempt groups already are actively participating in 2012 elections, and are expected to spend hundreds of millions of dollars on them.<sup>29</sup> Only vigorous enforcement by the IRS will deter other these organizations from violating our nation's tax laws for political gain.

Thank you for your prompt attention to this matter.

Sincerely,



Melanie Sloan  
Executive Director  
Citizens for Responsibility and Ethics in Washington

Encls.

cc: IRS-EO Classification

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<sup>28</sup> See, e.g., Letter from CREW to the IRS, March 8, 2011 (requesting investigation of the American Action Network, Inc. for violating its 501(c)(4) status); Letter from CREW to the IRS, February 1, 2011 (requesting investigation of the American Future Fund, Inc. for violating its 501(c)(4) status); Letter from Campaign Legal Center and Democracy 21 to the IRS, October 5, 2010 (requesting investigation of Crossroads GPS for violating its 501(c)(4) status).

<sup>29</sup> Dan Eggen, Nonprofits Using 'Secret Money' To Fund Campaign Ads, *Washington Post*, February 7, 2012 (attached as Exhibit F).

**EXHIBIT A**

**The New York Times**

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September 23, 2010

## Hidden Under Tax-Exempt Cloak, Political Dollars Flow

By MIKE McINTIRE

Alaskans grew suspicious two years ago when a national organization called Americans for Job Security showed up and spent \$1.6 million pushing a referendum to restrict development of a gold and copper mine at the headwaters of Bristol Bay.

It seemed an oddly parochial fight for a pro-business group based in the Washington suburbs that had spent tens of millions of dollars since the late 1990s roughing up Democrats with negative advertisements around election time.

But after the mine's supporters filed a complaint with the state, it became clear that what was depicted as grass-roots opposition was something else entirely: Americans for Job Security, investigators found, had helped create the illusion of a popular upwelling to shield the identity of a local financier who paid for most of the referendum campaign. More broadly, they said, far from being a national movement advocating a "pro-paycheck message," the group is actually a front for a coterie of political operatives, devised to sidestep campaign disclosure rules.

"Americans for Job Security has no purpose other than to cover various money trails all over the country," the staff of the Alaska Public Offices Commission said in a report last year.

The report went mostly unnoticed outside Anchorage. But its conclusions suddenly loom large in the current debate over nonprofit advocacy groups like Americans for Job Security, which campaign watchdogs say allow moneyed interests to influence elections without revealing themselves. Congress is now wrangling over a bill that would require some disclosure.

With every election cycle comes a shadow army of benignly titled nonprofit groups like Americans for Job Security, devoted to politically charged "issue advocacy," much of it negative. But they are now being heard as never before — in this year of midterm discontent, Tea Party ferment and the first test of the Supreme Court decision allowing unlimited, and often anonymous, corporate political spending. Already they have spent more than \$100 million — mostly for Republicans and more than twice as much as at this point four years ago.

None have been more active than Americans for Job Security, which spent \$6 million on ads during the primary season. This week, emboldened by the court ruling, the group paid close to \$4

million more for ads directly attacking nine Democratic candidates for Congress. That made it among the first to abandon the old approach of running ads that stopped just short of explicitly urging voters to elect or reject individual candidates.

Americans for Job Security says it is careful to hew to tax and campaign-finance laws: It may not spend the majority of its resources on political activity or coordinate with party committees, and may keep its donors secret only as long as their contributions are not intended for specific ad campaigns close to an election. Instead of earmarked donations, the group says, it collects membership dues and then decides, on its own, how to spend the money.

“We believe issue advocacy is much more effective than banging down doors of members of Congress,” said the group’s president, Stephen DeMaura. “And you now have the Supreme Court of the United States reaffirming our rights.”

An examination of Americans for Job Security — based on a review of its recent activities, as well as on interviews and previously unreleased documents from the Alaska case — provides a rare look inside the opaque world of these ascendant advocacy organizations. Its deep ties to a Republican consulting operation raise questions about whether, under cover of its tax-exempt mission “to promote a strong, job-creating economy,” the group is largely a funnel for anonymous donations.

“A lot of nonprofits game the system, but A.J.S. is unusual in that they so blatantly try to influence elections and evade disclosure,” said Taylor Lincoln, a research director at the watchdog group Public Citizen, which has filed complaints against the group in recent years. “By any common-sense, reasonable interpretation of what they do, they are in violation of the rules.”

### **Political Office Mates**

The group’s Republican connections begin with location: While its public address is a drop box at a United Parcel Service store in Alexandria, Va., Mr. DeMaura actually works out of space that is sublet from a Republican consulting shop, Crossroads Media, whose other clients include the national Republican Party, the Republican Governors Association and American Crossroads, a Karl Rove-backed group raising millions to support Republican candidates.

Crossroads Media is run by Michael Dubke and David Carney, who along with several business groups helped start Americans for Job Security in 1997. Mr. Carney had been political director for President George Bush, and Mr. Dubke was the first executive director and then president of Americans for Job Security until April 2008, when Mr. DeMaura, recruited by Mr. Carney, took over.

The office space in Alexandria that the group shares with Crossroads Media — Suite 555 at 66 Canal Center Plaza, overlooking the Potomac — is home to at least three other political consulting firms, including the Black Rock Group, which Mr. Dubke runs with Carl Forti, a longtime Republican operative who is political director for American Crossroads.

As for Mr. DeMaura, it turns out he is the sole employee of Americans for Job Security, a 25-year-old former executive director of the New Hampshire Republican Party who cut his political teeth as an undergraduate by starting an anti-[Hillary Clinton Facebook](#) page.

The chairwoman of the group's board of directors is listed in tax filings as Tabitha Connor, a [Columbia University](#) graduate student, also in her 20s. She did not respond to requests for comment.

According to testimony in the Alaska case, the board meets once every two years, and there are no committees or written policies shaping decisions about ad campaigns. Mr. DeMaura said he made those calls. He disputed suggestions that he was influenced by the consultants with whom he shares an office.

"I work with them closely on a day-to-day basis, but we don't discuss our work or coordinate anything," he said. "It's firewalled off."

Mr. Dubke, too, denied that the agenda of Americans for Job Security was driven by the political interests of his firms.

"Nothing is ever done in coordination with another campaign," he said. "I'm always trying to follow the letter of the law."

Still, while he is no longer an officer of Americans for Job Security, Mr. Dubke remains a consultant and has authority to countersign its checks. Crossroads Media also places many of the group's ads.

### **Blurred Boundaries**

It is sometimes hard to discern the boundaries separating Americans for Job Security from the consultants in its office suite and the interests of their Republican clients.

This month in upstate New York, the National Republican Congressional Committee — a sometime client of Mr. Dubke's — sent local reporters an Americans for Job Security announcement and transcript of a new ad opposing a Democratic congressman, Representative Michael Arcuri. A committee spokesman said he was not coordinating anything with the advocacy group, but merely passing along "a public document." The document, however, could not be found on the group's Web site, and a reporter who received it said the committee was his only source for it.

In May, the group ran an ad attacking a labor-backed Democrat in an Arkansas Senate primary, [Bill Halter](#), for having served on the board of a technology company that opened an office in India. The ad — placed by Crossroads and produced by another Republican-connected company in the office suite, WWP Strategies — played ethnic music, featured Indians in colorful garb expressing gratitude toward Mr. Halter for their jobs, and was widely derided as insulting toward people from India.

And in Texas in 2008, while Mr. DeMaura's office mates were consulting for the state Republican Party, he requested records from the Nueces County sheriff's office on an incident in which a woman ran naked from the home of a prominent Democratic donor, who was arrested after flashing a phony badge at the police. The disgraced donor was soon featured in a Republican Party television ad linking him to Democratic candidates for the Texas legislature. Mr. DeMaura said his request was not connected to the ad, but would not explain why he had sought the records.

Other aspects of the group's operations have come under scrutiny as well. In 2007, Public Citizen filed complaints with the Internal Revenue Service and the Federal Election Commission, contending that Americans for Job Security spent the vast majority of its resources electioneering — running ads close to elections — contrary to I.R.S. guidelines for tax-exempt, nonprofit business groups.

Public Citizen said it never heard back from the I.R.S. At the election commission, staff lawyers agreed that there was "reason to believe" that the group had violated campaign finance laws, and recommended a full investigation. But the commission deadlocked along party lines, and the complaint was dropped.

Because Americans for Job Security was formed as a tax-exempt business league — known as a 501(c)(6) in the tax code — it does not have to report its sources of income. Federal election rules, though, require that when a group accepts a donation earmarked for an electioneering ad, the donor must be identified.

Americans for Job Security avoids disclosure by reporting all its revenue as "membership dues." It claims more than 1,000 members. But a review of its tax returns shows membership revenue fluctuating wildly depending on election cycles — similar to the fund-raising of political committees that escalates during campaign season.

"Membership dues and assessments" totaled \$7 million in the 2004 presidential election, and dipped to \$1.2 million the following year before climbing back to \$3.9 million for the 2006 midterm elections. Then, in 2007, they plunged to zero before shooting up to \$12.2 million for the 2008 presidential race.

Asked how it could have collected no dues in 2007, neither Mr. Dubke nor Mr. DeMaura offered an answer. Mr. DeMaura said that there is no set membership fee and that members are not required to pay annually.

"They can if they want," he said.

### **A Hidden Hand in Alaska**

Probably the most extensive look at the operations of Americans for Job Security came during the inquiry in Alaska. Through a public information request, The New York Times obtained records from the investigation, including the group's internal e-mails and memorandums, as well as the

sworn testimony of Mr. Dubke and others.

The group ended up in Alaska through Mr. Dubke's work for opponents of the proposed Pebble Mine, led by an Alaska financier, Robert Gillam, whose private fishing lodge could be affected. The opponents said the mine would endanger commercial fishing and pushed a ballot initiative aimed at imposing clean-water restrictions on it; its backers said the mine would create jobs.

Mr. Dubke's work for Mr. Gillam was called Operation Trenchcoat, documents show, and involved finding out who was behind a pro-mine Web site called Bob Gillam Can't Buy Alaska. Mr. Gillam testified that he spoke with Mr. Dubke about Americans for Job Security, and decided to join by giving \$2 million in "membership fees," and that he "had high hopes" the money would be used to oppose the mine. (The ballot initiative ultimately failed.)

State investigators found that the advocacy group quickly passed almost all the money to another nonprofit, Alaskans for Clean Water, set up to campaign for the referendum by a group that included Art Hackney, a local Republican consultant and board member of Americans for Job Security. Mr. DeMaura told investigators that while he may have talked to Mr. Dubke about the mine issue, he decided to spend the money "based upon his own research and judgment," and that there was no prior agreement with Mr. Gillam or Mr. Dubke.

The Alaska Public Offices Commission's staff report called this "completely implausible" and concluded that Americans for Job Security had violated state law by acting as an improper conduit. It also took a shot at the group's explanation that it protects its members' identities so they can speak out without fear of reprisals.

"One would hardly expect reprisals for 'promoting a healthy and vibrant economy,' " the report said.

The group's lawyers accused the staff of making "reckless and baseless" accusations and of "misrepresenting a respected entity like A.J.S., known nationally for its skill and sophistication in conducting educational and issue-related campaigns." In a legal filing, they also worried that the allegations could be noticed "by the local, and potentially national, press."

Americans for Job Security eventually paid a \$20,000 settlement without admitting guilt and agreed not to help anyone make anonymous contributions in an election in Alaska — with the condition that its pledge "does not apply to any other jurisdiction which may have laws dissimilar to the state."

**EXHIBIT B**

**Return of Organization Exempt From Income Tax**  
Under section 501(c), 527, or 4947(a)(1) of the Internal Revenue Code (except black lung benefit trust or private foundation)

OMB No 1545-0047  
**2009**  
Open to Public Inspection

Department of the Treasury  
Internal Revenue Service

▶ The organization may have to use a copy of this return to satisfy state reporting requirements.

**A For the 2009 calendar year, or tax year beginning NOV 1, 2009 and ending OCT 31, 2010**

<b>B</b> Check if applicable: <input type="checkbox"/> Address change <input type="checkbox"/> Name change <input type="checkbox"/> Initial return <input type="checkbox"/> Terminated <input type="checkbox"/> Amended return <input type="checkbox"/> Application pending	Please use IRS label or print or type:  See Specific Instructions	<b>C Name of organization</b> <b>AMERICANS FOR JOB SECURITY</b> Doing Business As		<b>D Employer identification number</b> 52-2062978
		Number and street (or P.O. box if mail is not delivered to street address) Room/suite <b>107 SOUTH WEST STREET, PMB 551</b>		<b>E Telephone number</b> (703) 535-3110
		City or town, state or country, and ZIP + 4 <b>ALEXANDRIA, VA 22314</b>		<b>G Gross receipts \$</b> 12,411,684.
		<b>F Name and address of principal officer:</b> <b>STEPHEN DEMAURA</b> <b>SAME AS C ABOVE</b>		<b>H(a) Is this a group return for affiliates?</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <b>H(b) Are all affiliates included?</b> <input type="checkbox"/> Yes <input type="checkbox"/> No If "No," attach a list. (see instructions)
<b>I Tax-exempt status:</b> <input checked="" type="checkbox"/> 501(c) (6) (insert no.) <input type="checkbox"/> 4947(a)(1) or <input type="checkbox"/> 527		<b>J Website:</b> WWW.SAVEJOBS.ORG		
<b>K Form of organization:</b> <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Trust <input type="checkbox"/> Association <input type="checkbox"/> Other		<b>L Year of formation:</b> 1998 <b>M State of legal domicile:</b> DC		

**Part I Summary**

Activities & Governance	1 Briefly describe the organization's mission or most significant activities: <b>THE ORGANIZATION PERMITS BUSINESSES TO WORK TOGETHER TO PROMOTE A STRONG JOB-CREATING ECONOMY</b>			
	2 Check this box <input type="checkbox"/> if the organization discontinued its operations or disposed of more than 25% of its net assets.			
	3	Number of voting members of the governing body (Part VI, line 1a)	3	
	4	Number of independent voting members of the governing body (Part VI, line 1b)	2	
	5	Total number of employees (Part V, line 2a)	1	
	6	Total number of volunteers (estimate if necessary)	4	
	7a	Total gross unrelated business revenue from Part VIII, column (C), line 12	0.	
7b	Net unrelated business taxable income from Form 990-T, line 34	0.		
Revenue	8	Contributions and grants (Part VIII, line 1h)	Prior Year	Current Year
	9	Program service revenue (Part VIII, line 2g)	3,624,654.	12,411,053.
	10	Investment income (Part VIII, column (A), lines 3, 4, and 7d)	1,264.	631.
	11	Other revenue (Part VIII, column (A), lines 5, 6d, 8c, 9c, 10c, and 11e)		
	12	Total revenue - add lines 8 through 11 (must equal Part VIII, column (A), line 12)	3,625,918.	12,411,684.
Expenses	13	Grants and similar amounts paid (Part IX, column (A), lines 1-3)		
	14	Benefits paid to or for members (Part IX, column (A), line 4)		
	15	Salaries, other compensation, employee benefits (Part IX, column (A), lines 5-10)	201,386.	179,812.
	16a	Professional fundraising fees (Part IX, column (A), line 11e)	6,105.	
	16b	Total fundraising expenses (Part IX, column (D) line 25)		
	17	Other expenses (Part IX, column (A), lines 11a-11d, 11f-24f)	3,283,056.	12,237,997.
18	Total expenses. Add lines 13-17 (must equal Part IX, column (A), line 25)	3,490,547.	12,417,809.	
19	Revenue less expenses. Subtract line 18 from line 12	135,371.	<6,125.>	
Net Assets or Fund Balances	20	Total assets (Part X, line 16)	Beginning of Current Year	End of Year
	21	Total liabilities (Part X, line 26)	706,529.	700,403.
	22	Net assets or fund balances. Subtract line 21 from line 20	706,529.	700,403.

**Part II Signature Block**

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge.

Sign Here: *Stephen A DeMauro* Signature of officer Date: 7/29/11

STEPHEN DEMAURA Type or print name and title

Paid Preparer's Use Only: Preparer's signature: *Mildred CPA* Date: 7-20-11 Check if self-employed:  Preparer's identifying number (see instructions):  
 Firm's name (or yours if self-employed), address, and ZIP + 4: TRONCONI SEGARRA & ASSOCIATES LLP  
 6390 MAIN STREET, SUITE 200  
 WILLIAMSVILLE, NY 14221  
 EIN: Phone no.: 716-633-1373

May the IRS discuss this return with the preparer shown above? (see instructions)  Yes  No

SCANNED AUG 22 2011

Part III Statement of Program Service Accomplishments

1 Briefly describe the organization's mission: THE ORGANIZATION PERMITS BUSINESSES TO WORK TOGETHER TO PROMOTE A STRONG JOB-CREATING ECONOMY IN WHICH WORKERS HAVE GOOD JOB OPPORTUNITIES AND BUSINESSES CAN THRIVE. THE ORGANIZATION PROMOTES GOVERNMENTAL POLICY THAT REFLECTS ECONOMIC ISSUES OF THE WORKPLACE.

2 Did the organization undertake any significant program services during the year which were not listed on the prior Form 990 or 990-EZ? [ ] Yes [X] No If "Yes," describe these new services on Schedule O.

3 Did the organization cease conducting, or make significant changes in how it conducts, any program services? [ ] Yes [X] No If "Yes," describe these changes on Schedule O.

4 Describe the exempt purpose achievements for each of the organization's three largest program services by expenses. Section 501(c)(3) and 501(c)(4) organizations and section 4947(a)(1) trusts are required to report the amount of grants and allocations to others, the total expenses, and revenue, if any, for each program service reported.

4a (Code: ) (Expenses \$ 11,330,889. Including grants of \$ ) (Revenue \$ 12,411,053.) EDUCATING THE PUBLIC THROUGH TELEVISION, RADIO, NEWSPAPER AND DIRECT MAIL ADVERTISING AMONGST OTHER FORMS ON ECONOMIC ISSUES WITH A PRO-MARKET, PRO-PAYCHECK MESSAGE.

4b (Code: ) (Expenses \$ including grants of \$ ) (Revenue \$ )

4c (Code: ) (Expenses \$ including grants of \$ ) (Revenue \$ )

4d Other program services. (Describe in Schedule O.) (Expenses \$ including grants of \$ ) (Revenue \$ )

4e Total program service expenses \$ 11,330,889.

**Part IV Checklist of Required Schedules**

		Yes	No
1	Is the organization described in section 501(c)(3) or 4947(a)(1) (other than a private foundation)? <i>If "Yes," complete Schedule A</i>		X
2	Is the organization required to complete Schedule B, Schedule of Contributors?		X
3	Did the organization engage in direct or indirect political campaign activities on behalf of or in opposition to candidates for public office? <i>If "Yes," complete Schedule C, Part I</i>	X	
4	<b>Section 501(c)(3) organizations.</b> Did the organization engage in lobbying activities? <i>If "Yes," complete Schedule C, Part II</i>		
5	<b>Section 501(c)(4), 501(c)(5), and 501(c)(6) organizations.</b> Is the organization subject to the section 6033(e) notice and reporting requirement and proxy tax? <i>If "Yes," complete Schedule C, Part III</i>	X	
6	Did the organization maintain any donor advised funds or any similar funds or accounts where donors have the right to provide advice on the distribution or investment of amounts in such funds or accounts? <i>If "Yes," complete Schedule D, Part I</i>		X
7	Did the organization receive or hold a conservation easement, including easements to preserve open space, the environment, historic land areas, or historic structures? <i>If "Yes," complete Schedule D, Part II</i>		X
8	Did the organization maintain collections of works of art, historical treasures, or other similar assets? <i>If "Yes," complete Schedule D, Part III</i>		X
9	Did the organization report an amount in Part X, line 21; serve as a custodian for amounts not listed in Part X; or provide credit counseling, debt management, credit repair, or debt negotiation services? <i>If "Yes," complete Schedule D, Part IV</i>		X
10	Did the organization, directly or through a related organization, hold assets in term, permanent, or quasi-endowments? <i>If "Yes," complete Schedule D, Part V</i>		X
11	Is the organization's answer to any of the following questions "Yes"? <i>If so, complete Schedule D, Parts VI, VII, VIII, IX, or X as applicable</i>	X	
	• Did the organization report an amount for land, buildings, and equipment in Part X, line 10? <i>If "Yes," complete Schedule D, Part VI.</i>		
	• Did the organization report an amount for investments - other securities in Part X, line 12 that is 5% or more of its total assets reported in Part X, line 16? <i>If "Yes," complete Schedule D, Part VII.</i>		
	• Did the organization report an amount for investments - program related in Part X, line 13 that is 5% or more of its total assets reported in Part X, line 16? <i>If "Yes," complete Schedule D, Part VIII.</i>		
	• Did the organization report an amount for other assets in Part X, line 15 that is 5% or more of its total assets reported in Part X, line 16? <i>If "Yes," complete Schedule D, Part IX.</i>		
	• Did the organization report an amount for other liabilities in Part X, line 25? <i>If "Yes," complete Schedule D, Part X.</i>		
	• Did the organization's separate or consolidated financial statements for the tax year include a footnote that addresses the organization's liability for uncertain tax positions under FIN 48? <i>If "Yes," complete Schedule D, Part X.</i>		
12	Did the organization obtain separate, independent audited financial statements for the tax year? <i>If "Yes," complete Schedule D, Parts XI, XII, and XIII</i>		X
12A	Was the organization included in consolidated, independent audited financial statements for the tax year? <i>If "Yes," completing Schedule D, Parts XI, XII, and XIII is optional</i>	Yes	No
			X
13	Is the organization a school described in section 170(b)(1)(A)(ii)? <i>If "Yes," complete Schedule E</i>		X
14a	Did the organization maintain an office, employees, or agents outside of the United States?		X
14b	Did the organization have aggregate revenues or expenses of more than \$10,000 from grantmaking, fundraising, business, and program service activities outside the United States? <i>If "Yes," complete Schedule F, Part I</i>		X
15	Did the organization report on Part IX, column (A), line 3, more than \$5,000 of grants or assistance to any organization or entity located outside the United States? <i>If "Yes," complete Schedule F, Part II</i>		X
16	Did the organization report on Part IX, column (A), line 3, more than \$5,000 of aggregate grants or assistance to individuals located outside the United States? <i>If "Yes," complete Schedule F, Part III</i>		X
17	Did the organization report a total of more than \$15,000 of expenses for professional fundraising services on Part IX, column (A), lines 6 and 11e? <i>If "Yes," complete Schedule G, Part I</i>		X
18	Did the organization report more than \$15,000 total of fundraising event gross income and contributions on Part VIII, lines 1c and 8a? <i>If "Yes," complete Schedule G, Part II</i>		X
19	Did the organization report more than \$15,000 of gross income from gaming activities on Part VIII, line 9a? <i>If "Yes," complete Schedule G, Part III</i>		X
20	Did the organization operate one or more hospitals? <i>If "Yes," complete Schedule H</i>		X

**Part IV Checklist of Required Schedules** (continued)

	Yes	No
21 Did the organization report more than \$5,000 of grants and other assistance to governments and organizations in the United States on Part IX, column (A), line 1? <i>If "Yes," complete Schedule I, Parts I and II</i>		X
22 Did the organization report more than \$5,000 of grants and other assistance to individuals in the United States on Part IX, column (A), line 2? <i>If "Yes," complete Schedule I, Parts I and III</i>		X
23 Did the organization answer "Yes" to Part VII, Section A, line 3, 4, or 5 about compensation of the organization's current and former officers, directors, trustees, key employees, and highest compensated employees? <i>If "Yes," complete Schedule J</i>		X
24a Did the organization have a tax-exempt bond issue with an outstanding principal amount of more than \$100,000 as of the last day of the year, that was issued after December 31, 2002? <i>If "Yes," answer lines 24b through 24d and complete Schedule K. If "No," go to line 25</i>		X
b Did the organization invest any proceeds of tax-exempt bonds beyond a temporary period exception?		
c Did the organization maintain an escrow account other than a refunding escrow at any time during the year to defease any tax-exempt bonds?		
d Did the organization act as an "on behalf of" issuer for bonds outstanding at any time during the year?		
25a Section 501(c)(3) and 501(c)(4) organizations. Did the organization engage in an excess benefit transaction with a disqualified person during the year? <i>If "Yes," complete Schedule L, Part I</i>		
b Is the organization aware that it engaged in an excess benefit transaction with a disqualified person in a prior year, and that the transaction has not been reported on any of the organization's prior Forms 990 or 990-EZ? <i>If "Yes," complete Schedule L, Part I</i>		
26 Was a loan to or by a current or former officer, director, trustee, key employee, highly compensated employee, or disqualified person outstanding as of the end of the organization's tax year? <i>If "Yes," complete Schedule L, Part II</i>		X
27 Did the organization provide a grant or other assistance to an officer, director, trustee, key employee, substantial contributor, or a grant selection committee member, or to a person related to such an individual? <i>If "Yes," complete Schedule L, Part III</i>		X
28 Was the organization a party to a business transaction with one of the following parties, (see Schedule L, Part IV instructions for applicable filing thresholds, conditions, and exceptions):		
a A current or former officer, director, trustee, or key employee? <i>If "Yes," complete Schedule L, Part IV</i>	X	
b A family member of a current or former officer, director, trustee, or key employee? <i>If "Yes," complete Schedule L, Part IV</i>		X
c An entity of which a current or former officer, director, trustee, or key employee of the organization (or a family member) was an officer, director, trustee, or direct or indirect owner? <i>If "Yes," complete Schedule L, Part IV</i>		X
29 Did the organization receive more than \$25,000 in non-cash contributions? <i>If "Yes," complete Schedule M</i>		X
30 Did the organization receive contributions of art, historical treasures, or other similar assets, or qualified conservation contributions? <i>If "Yes," complete Schedule M</i>		X
31 Did the organization liquidate, terminate, or dissolve and cease operations? <i>If "Yes," complete Schedule N, Part I</i>		X
32 Did the organization sell, exchange, dispose of, or transfer more than 25% of its net assets? <i>If "Yes," complete Schedule N, Part II</i>		X
33 Did the organization own 100% of an entity disregarded as separate from the organization under Regulations sections 301.7701-2 and 301.7701-3? <i>If "Yes," complete Schedule R, Part I</i>		X
34 Was the organization related to any tax-exempt or taxable entity? <i>If "Yes," complete Schedule R, Parts II, III, IV, and V, line 1</i>		X
35 Is any related organization a controlled entity within the meaning of section 512(b)(13)? <i>If "Yes," complete Schedule R, Part V, line 2</i>		X
36 Section 501(c)(3) organizations. Did the organization make any transfers to an exempt non-charitable related organization? <i>If "Yes," complete Schedule R, Part V, line 2</i>		
37 Did the organization conduct more than 5% of its activities through an entity that is not a related organization and that is treated as a partnership for federal income tax purposes? <i>If "Yes," complete Schedule R, Part VI</i>		X
38 Did the organization complete Schedule O and provide explanations in Schedule O for Part VI, lines 11 and 19? Note. All Form 990 filers are required to complete Schedule O.	X	



**Part VI Governance, Management, and Disclosure** For each "Yes" response to lines 2 through 7b below, and for a "No" response to line 8a, 8b, or 10b below, describe the circumstances, processes, or changes in Schedule O. See instructions.

**Section A. Governing Body and Management**

	Yes	No
1a Enter the number of voting members of the governing body		
1b Enter the number of voting members that are independent		
2 Did any officer, director, trustee, or key employee have a family relationship or a business relationship with any other officer, director, trustee, or key employee?		X
3 Did the organization delegate control over management duties customarily performed by or under the direct supervision of officers, directors or trustees, or key employees to a management company or other person?		X
4 Did the organization make any significant changes to its organizational documents since the prior Form 990 was filed?		X
5 Did the organization become aware during the year of a material diversion of the organization's assets?		X
6 Does the organization have members or stockholders?	X	
7a Does the organization have members, stockholders, or other persons who may elect one or more members of the governing body?		X
7b Are any decisions of the governing body subject to approval by members, stockholders, or other persons?		X
8 Did the organization contemporaneously document the meetings held or written actions undertaken during the year by the following:		
a The governing body?	X	
b Each committee with authority to act on behalf of the governing body?	X	
9 Is there any officer, director, trustee, or key employee listed in Part VII, Section A, who cannot be reached at the organization's mailing address? If "Yes," provide the names and addresses in Schedule O		X

**Section B. Policies** (This Section B requests information about policies not required by the Internal Revenue Code.)

	Yes	No
10a Does the organization have local chapters, branches, or affiliates?		X
b If "Yes," does the organization have written policies and procedures governing the activities of such chapters, affiliates, and branches to ensure their operations are consistent with those of the organization?		
11 Has the organization provided a copy of this Form 990 to all members of its governing body before filing the form?	X	
11A Describe in Schedule O the process, if any, used by the organization to review this Form 990.		
12a Does the organization have a written conflict of interest policy? If "No," go to line 13		X
b Are officers, directors or trustees, and key employees required to disclose annually interests that could give rise to conflicts?		
c Does the organization regularly and consistently monitor and enforce compliance with the policy? If "Yes," describe in Schedule O how this is done		
13 Does the organization have a written whistleblower policy?		X
14 Does the organization have a written document retention and destruction policy?		X
15 Did the process for determining compensation of the following persons include a review and approval by independent persons, comparability data, and contemporaneous substantiation of the deliberation and decision?		
a The organization's CEO, Executive Director, or top management official		X
b Other officers or key employees of the organization		X
If "Yes" to line 15a or 15b, describe the process in Schedule O. (See instructions.)		
16a Did the organization invest in, contribute assets to, or participate in a joint venture or similar arrangement with a taxable entity during the year?		X
b If "Yes," has the organization adopted a written policy or procedure requiring the organization to evaluate its participation in joint venture arrangements under applicable federal tax law, and taken steps to safeguard the organization's exempt status with respect to such arrangements?		

**Section C. Disclosure**

- 17 List the states with which a copy of this Form 990 is required to be filed **NONE**
- 18 Section 6104 requires an organization to make its Forms 1023 (or 1024 if applicable), 990, and 990-T (501(c)(3)s only) available for public inspection. Indicate how you make these available. Check all that apply.  
 Own website     Another's website     Upon request
- 19 Describe in Schedule O whether (and if so, how), the organization makes its governing documents, conflict of interest policy, and financial statements available to the public.
- 20 State the name, physical address, and telephone number of the person who possesses the books and records of the organization: **STEPHEN DEMAURA - (703) 535-3110**  
**107 SOUTH WEST STREET, PMB 551, ALEXANDRIA, VA 22314**



**Part VII** Section A. Officers, Directors, Trustees, Key Employees, and Highest Compensated Employees (continued)

(A) Name and title	(B) Average hours per week	(C) Position (check all that apply)						(D) Reportable compensation from the organization (W-2/1099-MISC)	(E) Reportable compensation from related organizations (W-2/1099-MISC)	(F) Estimated amount of other compensation from the organization and related organizations
		Individual trustee or director	Institutional trustee	Officer	Key employee	Highest compensated employee	Former			
<b>1b Total</b>								109,750.	0.	17,448.

2 Total number of individuals (including but not limited to those listed above) who received more than \$100,000 in reportable compensation from the organization **1**

	Yes	No
3 Did the organization list any former officer, director or trustee, key employee, or highest compensated employee on line 1a? If "Yes," complete Schedule J for such individual		X
4 For any individual listed on line 1a, is the sum of reportable compensation and other compensation from the organization and related organizations greater than \$150,000? If "Yes," complete Schedule J for such individual		X
5 Did any person listed on line 1a receive or accrue compensation from any unrelated organization for services rendered to the organization? If "Yes," complete Schedule J for such person		X

**Section B. Independent Contractors**

1 Complete this table for your five highest compensated independent contractors that received more than \$100,000 of compensation from the organization.

(A) Name and business address	(B) Description of services	(C) Compensation
LIBERTY SERVICE CORPORATION, 3 S. TEJON STREET, #250, COLORADO SPRINGS, CO 80903	CONSULTING	260,000.
THE NOVEMBER COMPANY 904 WAYNEWOOD BLVD., ALEXANDRIA, VA 22308	CONSULTING	172,250.
NORWAY HILL ASSOCIATES 30 NORWAY HILL ROAD, HANCOCK, NH 03449	CONSULTING	151,303.
PATTON BOGGS, L.L.P. 2550 MAIN STREET, WASHINGTON, DC 20037	LEGAL SERVICES	115,111.

2 Total number of independent contractors (including but not limited to those listed above) who received more than \$100,000 in compensation from the organization **4**

**Part VIII Statement of Revenue**

			(A) Total revenue	(B) Related or exempt function revenue	(C) Unrelated business revenue	(D) Revenue excluded from tax under sections 512, 513, or 514	
<b>Contributions, gifts, grants and other similar amounts</b>	1 a Federated campaigns	1a					
	b Membership dues	1b					
	c Fundraising events	1c					
	d Related organizations	1d					
	e Government grants (contributions)	1e					
	f All other contributions, gifts, grants, and similar amounts not included above	1f					
	g Noncash contributions included in lines 1a-1f \$						
	h <b>Total. Add lines 1a-1f</b>						
	<b>Program Service Revenue</b>	2 a <b>SEE SCHEDULE O</b>	Business Code 900099	12411053.	12411053.		
b							
c							
d							
e							
f All other program service revenue							
g <b>Total. Add lines 2a-2f</b>			12411053.				
<b>Other Revenue</b>	3 Investment income (including dividends, interest, and other similar amounts)		631.			631.	
	4 Income from investment of tax-exempt bond proceeds						
	5 Royalties						
	6 a Gross Rents	(i) Real					
		(ii) Personal					
		b Less: rental expenses					
		c Rental income or (loss)					
	d Net rental income or (loss)						
	7 a Gross amount from sales of assets other than inventory	(i) Securities					
		(ii) Other					
		b Less: cost or other basis and sales expenses					
		c Gain or (loss)					
	d Net gain or (loss)						
	8 a Gross income from fundraising events (not including \$ _____ of contributions reported on line 1c). See Part IV, line 18	a					
		b Less: direct expenses	b				
c Net income or (loss) from fundraising events							
9 a Gross income from gaming activities. See Part IV, line 19	a						
	b Less: direct expenses	b					
	c Net income or (loss) from gaming activities						
10 a Gross sales of inventory, less returns and allowances	a						
	b Less: cost of goods sold	b					
	c Net income or (loss) from sales of inventory						
<b>Miscellaneous Revenue</b>		<b>Business Code</b>					
11 a							
b							
c							
d All other revenue							
e <b>Total. Add lines 11a-11d</b>							
12 <b>Total revenue. See instructions.</b>			12411684.	12411053.	0.	631.	

**Part IX Statement of Functional Expenses**

Section 501(c)(3) and 501(c)(4) organizations must complete all columns.

All other organizations must complete column (A) but are not required to complete columns (B), (C), and (D).

Do not include amounts reported on lines 6b, 7b, 8b, 9b, and 10b of Part VIII.	(A) Total expenses	(B) Program service expenses	(C) Management and general expenses	(D) Fundraising expenses
1 Grants and other assistance to governments and organizations in the U.S. See Part IV, line 21				
2 Grants and other assistance to individuals in the U.S. See Part IV, line 22				
3 Grants and other assistance to governments, organizations, and individuals outside the U.S. See Part IV, lines 15 and 16				
4 Benefits paid to or for members				
5 Compensation of current officers, directors, trustees, and key employees	152,659.			
6 Compensation not included above, to disqualified persons (as defined under section 4958(f)(1)) and persons described in section 4958(c)(3)(B)				
7 Other salaries and wages				
8 Pension plan contributions (include section 401(k) and section 403(b) employer contributions)				
9 Other employee benefits	17,448.			
10 Payroll taxes	9,705.			
11 Fees for services (non-employees):				
a Management	325,703.			
b Legal	150,987.			
c Accounting	3,300.			
d Lobbying				
e Professional fundraising services. See Part IV, line 17				
f Investment management fees				
g Other	347,871.			
12 Advertising and promotion				
13 Office expenses	6,374.			
14 Information technology				
15 Royalties				
16 Occupancy	25,275.			
17 Travel	12,679.			
18 Payments of travel or entertainment expenses for any federal, state, or local public officials				
19 Conferences, conventions, and meetings				
20 Interest				
21 Payments to affiliates				
22 Depreciation, depletion, and amortization	16,772.			
23 Insurance	12,078.			
24 Other expenses. Itemize expenses not covered above. (Expenses grouped together and labeled miscellaneous may not exceed 5% of total expenses shown on line 25 below.)				
a <u>MEDIA SERVICES /PLACEME</u>	10,374,852.			
b <u>POSTAGE &amp; DELIVERY</u>	363,893.			
c <u>TELEPHONE SERVICES</u>	269,793.			
d <u>MAIL SERVICES</u>	183,287.			
e <u>PRINTING AND REPRODUCTI</u>	139,064.			
f All other expenses	6,069.			
25 Total functional expenses. Add lines 1 through 24f	12,417,809.			
26 Joint costs. Check here <input type="checkbox"/> if following SOP 98-2. Complete this line only if the organization reported in column (B) joint costs from a combined educational campaign and fundraising solicitation				

**Part X Balance Sheet**

		(A) Beginning of year		(B) End of year
<b>Assets</b>	1 Cash - non-interest-bearing	1,099.	1	458,205.
	2 Savings and temporary cash investments	648,475.	2	201,090.
	3 Pledges and grants receivable, net		3	
	4 Accounts receivable, net		4	
	5 Receivables from current and former officers, directors, trustees, key employees, and highest compensated employees. Complete Part II of Schedule L		5	
	6 Receivables from other disqualified persons (as defined under section 4958(f)(1)) and persons described in section 4958(c)(3)(B). Complete Part II of Schedule L		6	
	7 Notes and loans receivable, net		7	
	8 Inventories for sale or use		8	
	9 Prepaid expenses and deferred charges		9	
	10a Land, buildings, and equipment: cost or other basis. Complete Part VI of Schedule D	10a 77,579.		
	b Less: accumulated depreciation	10b 36,495.	56,931.	10c 41,084.
	11 Investments - publicly traded securities		11	
	12 Investments - other securities. See Part IV, line 11		12	
	13 Investments - program-related. See Part IV, line 11		13	
	14 Intangible assets		14	
	15 Other assets. See Part IV, line 11		24.	24.
16 <b>Total assets.</b> Add lines 1 through 15 (must equal line 34)		706,529.	16	700,403.
<b>Liabilities</b>	17 Accounts payable and accrued expenses		17	
	18 Grants payable		18	
	19 Deferred revenue		19	
	20 Tax-exempt bond liabilities		20	
	21 Escrow or custodial account liability. Complete Part IV of Schedule D		21	
	22 Payables to current and former officers, directors, trustees, key employees, highest compensated employees, and disqualified persons. Complete Part II of Schedule L		22	
	23 Secured mortgages and notes payable to unrelated third parties		23	
	24 Unsecured notes and loans payable to unrelated third parties		24	
	25 Other liabilities. Complete Part X of Schedule D		25	
	26 <b>Total liabilities.</b> Add lines 17 through 25		0.	26
<b>Net Assets or Fund Balances</b>	Organizations that follow SFAS 117, check here <input type="checkbox"/> and complete lines 27 through 29, and lines 33 and 34.			
	27 Unrestricted net assets		27	
	28 Temporarily restricted net assets		28	
	29 Permanently restricted net assets		29	
	Organizations that do not follow SFAS 117, check here <input checked="" type="checkbox"/> and complete lines 30 through 34.			
	30 Capital stock or trust principal, or current funds	0.	30	0.
	31 Paid-in or capital surplus, or land, building, or equipment fund	0.	31	0.
	32 Retained earnings, endowment, accumulated income, or other funds	706,529.	32	700,403.
33 Total net assets or fund balances	706,529.	33	700,403.	
34 <b>Total liabilities and net assets/fund balances</b>	706,529.	34	700,403.	

**Part XI. Financial Statements and Reporting**

	Yes	No
<b>1</b> Accounting method used to prepare the Form 990: <input checked="" type="checkbox"/> Cash <input type="checkbox"/> Accrual <input type="checkbox"/> Other _____ If the organization changed its method of accounting from a prior year or checked "Other," explain in Schedule O.		
<b>2a</b> Were the organization's financial statements compiled or reviewed by an independent accountant?		X
<b>2b</b> Were the organization's financial statements audited by an independent accountant?		X
<b>2c</b> If "Yes" to line 2a or 2b, does the organization have a committee that assumes responsibility for oversight of the audit, review, or compilation of its financial statements and selection of an independent accountant? If the organization changed either its oversight process or selection process during the tax year, explain in Schedule O		
<b>d</b> If "Yes" to line 2a or 2b, check a box below to indicate whether the financial statements for the year were issued on a consolidated basis, separate basis, or both: <input type="checkbox"/> Separate basis <input type="checkbox"/> Consolidated basis <input type="checkbox"/> Both consolidated and separate basis		
<b>3a</b> As a result of a federal award, was the organization required to undergo an audit or audits as set forth in the Single Audit Act and OMB Circular A-133?		X
<b>3b</b> If "Yes," did the organization undergo the required audit or audits? If the organization did not undergo the required audit or audits, explain why in Schedule O and describe any steps taken to undergo such audits.		

**SCHEDULE C**  
**(Form 990 or 990-EZ)**

**Political Campaign and Lobbying Activities**  
**For Organizations Exempt From Income Tax Under section 501(c) and section 527**

OMB No 1545-0047

**2009**

**Open to Public Inspection**

Department of the Treasury  
Internal Revenue Service

▶ **Complete if the organization is described below.**

▶ **Attach to Form 990 or Form 990-EZ. ▶ See separate instructions.**

If the organization answered "Yes," to Form 990, Part IV, line 3, or Form 990-EZ, Part VI, line 46 (Political Campaign Activities), then

- Section 501(c)(3) organizations. Complete Parts I-A and B. Do not complete Part I-C.
- Section 501(c) (other than section 501(c)(3)) organizations: Complete Parts I-A and C below. Do not complete Part I-B.
- Section 527 organizations: Complete Part I-A only.

If the organization answered "Yes," to Form 990, Part IV, line 4, or Form 990-EZ, Part VI, line 47 (Lobbying Activities), then

- Section 501(c)(3) organizations that have filed Form 5768 (election under section 501(h)): Complete Part II-A. Do not complete Part II-B.
- Section 501(c)(3) organizations that have NOT filed Form 5768 (election under section 501(h)): Complete Part II-B. Do not complete Part II-A.

If the organization answered "Yes," to Form 990, Part IV, line 5 (Proxy Tax), then

- Section 501(c)(4), (5), or (6) organizations: Complete Part III.

Name of organization <b>AMERICANS FOR JOB SECURITY</b>	Employer identification number <b>52-2062978</b>
-----------------------------------------------------------	-----------------------------------------------------

**Part I-A Complete if the organization is exempt under section 501(c) or is a section 527 organization.**

- 1 Provide a description of the organization's direct and indirect political campaign activities in Part IV.
- 2 Political expenditures ▶ \$ 4,351,478.
- 3 Volunteer hours 0.

**Part I-B Complete if the organization is exempt under section 501(c)(3).**

- 1 Enter the amount of any excise tax incurred by the organization under section 4955 ▶ \$ \_\_\_\_\_
- 2 Enter the amount of any excise tax incurred by organization managers under section 4955 ▶ \$ \_\_\_\_\_
- 3 If the organization incurred a section 4955 tax, did it file Form 4720 for this year?  Yes  No
- 4a Was a correction made?  Yes  No
- b If "Yes," describe in Part IV.

**Part I-C Complete if the organization is exempt under section 501(c), except section 501(c)(3).**

- 1 Enter the amount directly expended by the filing organization for section 527 exempt function activities ▶ \$ 4,351,478.
- 2 Enter the amount of the filing organization's funds contributed to other organizations for section 527 exempt function activities ▶ \$ \_\_\_\_\_
- 3 Total exempt function expenditures. Add lines 1 and 2. Enter here and on Form 1120-POL, line 17b ▶ \$ 4,351,478.
- 4 Did the filing organization file Form 1120-POL for this year?  Yes  No
- 5 Enter the names, addresses and employer identification number (EIN) of all section 527 political organizations to which payments were made. For each organization listed, enter the amount paid from the filing organization's funds. Also enter the amount of political contributions received that were promptly and directly delivered to a separate political organization, such as a separate segregated fund or a political action committee (PAC). If additional space is needed, provide information in Part IV.

(a) Name	(b) Address	(c) EIN	(d) Amount paid from filing organization's funds. If none, enter -0-	(e) Amount of political contributions received and promptly and directly delivered to a separate political organization. If none, enter -0-

**Part II-A** Complete if the organization is exempt under section 501(c)(3) and filed Form 5768 (election under section 501(h)).

- A** Check  if the filing organization belongs to an affiliated group.  
**B** Check  if the filing organization checked box A and "limited control" provisions apply.

Limits on Lobbying Expenditures (The term "expenditures" means amounts paid or incurred.)	(a) Filing organization's totals	(b) Affiliated group totals												
<b>1a</b> Total lobbying expenditures to influence public opinion (grass roots lobbying)														
<b>b</b> Total lobbying expenditures to influence a legislative body (direct lobbying)														
<b>c</b> Total lobbying expenditures (add lines 1a and 1b)														
<b>d</b> Other exempt purpose expenditures														
<b>e</b> Total exempt purpose expenditures (add lines 1c and 1d)														
<b>f</b> Lobbying nontaxable amount. Enter the amount from the following table in both columns.														
<table border="1" style="width:100%; border-collapse: collapse;"> <thead> <tr> <th style="width:35%;">If the amount on line 1e, column (a) or (b) is:</th> <th style="width:65%;">The lobbying nontaxable amount is:</th> </tr> </thead> <tbody> <tr> <td>Not over \$500,000</td> <td>20% of the amount on line 1e.</td> </tr> <tr> <td>Over \$500,000 but not over \$1,000,000</td> <td>\$100,000 plus 15% of the excess over \$500,000.</td> </tr> <tr> <td>Over \$1,000,000 but not over \$1,500,000</td> <td>\$175,000 plus 10% of the excess over \$1,000,000.</td> </tr> <tr> <td>Over \$1,500,000 but not over \$17,000,000</td> <td>\$225,000 plus 5% of the excess over \$1,500,000.</td> </tr> <tr> <td>Over \$17,000,000</td> <td>\$1,000,000.</td> </tr> </tbody> </table>	If the amount on line 1e, column (a) or (b) is:	The lobbying nontaxable amount is:	Not over \$500,000	20% of the amount on line 1e.	Over \$500,000 but not over \$1,000,000	\$100,000 plus 15% of the excess over \$500,000.	Over \$1,000,000 but not over \$1,500,000	\$175,000 plus 10% of the excess over \$1,000,000.	Over \$1,500,000 but not over \$17,000,000	\$225,000 plus 5% of the excess over \$1,500,000.	Over \$17,000,000	\$1,000,000.		
If the amount on line 1e, column (a) or (b) is:	The lobbying nontaxable amount is:													
Not over \$500,000	20% of the amount on line 1e.													
Over \$500,000 but not over \$1,000,000	\$100,000 plus 15% of the excess over \$500,000.													
Over \$1,000,000 but not over \$1,500,000	\$175,000 plus 10% of the excess over \$1,000,000.													
Over \$1,500,000 but not over \$17,000,000	\$225,000 plus 5% of the excess over \$1,500,000.													
Over \$17,000,000	\$1,000,000.													
<b>g</b> Grassroots nontaxable amount (enter 25% of line 1f)														
<b>h</b> Subtract line 1g from line 1a. If zero or less, enter -0-														
<b>i</b> Subtract line 1f from line 1c. If zero or less, enter -0-														
<b>j</b> If there is an amount other than zero on either line 1h or line 1i, did the organization file Form 4720 reporting section 4911 tax for this year?		<input type="checkbox"/> Yes <input type="checkbox"/> No												

**4-Year Averaging Period Under Section 501(h)**  
 (Some organizations that made a section 501(h) election do not have to complete all of the five columns below. See the instructions for lines 2a through 2f on page 4.)

Lobbying Expenditures During 4-Year Averaging Period					
Calendar year (or fiscal year beginning in)	(a) 2006	(b) 2007	(c) 2008	(d) 2009	(e) Total
<b>2a</b> Lobbying nontaxable amount					
<b>b</b> Lobbying ceiling amount (150% of line 2a, column(e))					
<b>c</b> Total lobbying expenditures					
<b>d</b> Grassroots nontaxable amount					
<b>e</b> Grassroots ceiling amount (150% of line 2d, column (e))					
<b>f</b> Grassroots lobbying expenditures					

**Part II-B** Complete if the organization is exempt under section 501(c)(3) and has NOT filed Form 5768 (election under section 501(h)).

	(a)		(b)
	Yes	No	Amount
1 During the year, did the filing organization attempt to influence foreign, national, state or local legislation, including any attempt to influence public opinion on a legislative matter or referendum, through the use of:			
a Volunteers?			
b Paid staff or management (include compensation in expenses reported on lines 1c through 1j)?			
c Media advertisements?			
d Mailings to members, legislators, or the public?			
e Publications, or published or broadcast statements?			
f Grants to other organizations for lobbying purposes?			
g Direct contact with legislators, their staffs, government officials, or a legislative body?			
h Rallies, demonstrations, seminars, conventions, speeches, lectures, or any similar means?			
i Other activities? If "Yes," describe in Part IV			
j Total. Add lines 1c through 1i			
2a Did the activities in line 1 cause the organization to be not described in section 501(c)(3)?			
b If "Yes," enter the amount of any tax incurred under section 4912			
c If "Yes," enter the amount of any tax incurred by organization managers under section 4912			
d If the filing organization incurred a section 4912 tax, did it file Form 4720 for this year?			

**Part III-A** Complete if the organization is exempt under section 501(c)(4), section 501(c)(5), or section 501(c)(6).

	Yes	No
1 Were substantially all (90% or more) dues received nondeductible by members?	1	X
2 Did the organization make only in-house lobbying expenditures of \$2,000 or less?	2	X
3 Did the organization agree to carryover lobbying and political expenditures from the prior year?	3	X

**Part III-B** Complete if the organization is exempt under section 501(c)(4), section 501(c)(5), or section 501(c)(6) if BOTH Part III-A, lines 1 and 2 are answered "No" OR if Part III-A, line 3 is answered "Yes."

1 Dues, assessments and similar amounts from members	1	12,411,053.
2 Section 162(e) nondeductible lobbying and political expenditures (do not include amounts of political expenses for which the section 527(f) tax was paid).		
a Current year	2a	12,286,943.
b Carryover from last year	2b	
c Total	2c	12,286,943.
3 Aggregate amount reported in section 6033(e)(1)(A) notices of nondeductible section 162(e) dues	3	12,411,053.
4 If notices were sent and the amount on line 2c exceeds the amount on line 3, what portion of the excess does the organization agree to carryover to the reasonable estimate of nondeductible lobbying and political expenditure next year?	4	
5 Taxable amount of lobbying and political expenditures (see instructions)	5	<124,110.>

**Part IV** Supplemental Information

Complete this part to provide the descriptions required for Part I-A, line 1, Part I-B, line 4; Part I-C, line 5; and Part II-B, line 1. Also, complete this part for any additional information.

**PART I-A, LINE 1:**

THE ORGANIZATION INCURRED INDEPENDENT EXPENDITURES FOR MAILINGS AND TELEVISION ADS IN OPPOSITION TO OR SUPPORT OF CANDIDATES. THE ORGANIZATION SEEKS A CONGRESS THAT IS MORE RECEPTIVE TO THE ORGANIZATION'S MISSION.

**Schedule D**  
(Form 990)

Department of the Treasury  
Internal Revenue Service

**Supplemental Financial Statements**

▶ Complete if the organization answered "Yes," to Form 990, Part IV, line 6, 7, 8, 9, 10, 11, or 12.  
▶ Attach to Form 990. ▶ See separate instructions.

OMB No 1545-0047

**2009**

Open to Public Inspection

Name of the organization

**AMERICANS FOR JOB SECURITY**

Employer identification number

**52-2062978**

**Part I: Organizations Maintaining Donor Advised Funds or Other Similar Funds or Accounts.** Complete if the organization answered "Yes" to Form 990, Part IV, line 6.

	(a) Donor advised funds	(b) Funds and other accounts
1 Total number at end of year		
2 Aggregate contributions to (during year)		
3 Aggregate grants from (during year)		
4 Aggregate value at end of year		
5 Did the organization inform all donors and donor advisors in writing that the assets held in donor advised funds are the organization's property, subject to the organization's exclusive legal control?		<input type="checkbox"/> Yes <input type="checkbox"/> No
6 Did the organization inform all grantees, donors, and donor advisors in writing that grant funds can be used only for charitable purposes and not for the benefit of the donor or donor advisor, or for any other purpose conferring impermissible private benefit?		<input type="checkbox"/> Yes <input type="checkbox"/> No

**Part II: Conservation Easements.** Complete if the organization answered "Yes" to Form 990, Part IV, line 7.

- Purpose(s) of conservation easements held by the organization (check all that apply).
 

<input type="checkbox"/> Preservation of land for public use (e.g., recreation or pleasure)	<input type="checkbox"/> Preservation of an historically important land area
<input type="checkbox"/> Protection of natural habitat	<input type="checkbox"/> Preservation of a certified historic structure
<input type="checkbox"/> Preservation of open space	
- Complete lines 2a through 2d if the organization held a qualified conservation contribution in the form of a conservation easement on the last day of the tax year.
 

	Held at the End of the Tax Year
a Total number of conservation easements	2a
b Total acreage restricted by conservation easements	2b
c Number of conservation easements on a certified historic structure included in (a)	2c
d Number of conservation easements included in (c) acquired after 8/17/06	2d
- Number of conservation easements modified, transferred, released, extinguished, or terminated by the organization during the tax year ▶ \_\_\_\_\_
- Number of states where property subject to conservation easement is located ▶ \_\_\_\_\_
- Does the organization have a written policy regarding the periodic monitoring, inspection, handling of violations, and enforcement of the conservation easements it holds?  Yes  No
- Staff and volunteer hours devoted to monitoring, inspecting, and enforcing conservation easements during the year ▶ \_\_\_\_\_
- Amount of expenses incurred in monitoring, inspecting, and enforcing conservation easements during the year ▶ \$ \_\_\_\_\_
- Does each conservation easement reported on line 2(d) above satisfy the requirements of section 170(h)(4)(B)(i) and section 170(h)(4)(B)(ii)?  Yes  No
- In Part XIV, describe how the organization reports conservation easements in its revenue and expense statement, and balance sheet, and include, if applicable, the text of the footnote to the organization's financial statements that describes the organization's accounting for conservation easements.

**Part III: Organizations Maintaining Collections of Art, Historical Treasures, or Other Similar Assets.**

Complete if the organization answered "Yes" to Form 990, Part IV, line 8.

- If the organization elected, as permitted under SFAS 116, not to report in its revenue statement and balance sheet works of art, historical treasures, or other similar assets held for public exhibition, education, or research in furtherance of public service, provide, in Part XIV, the text of the footnote to its financial statements that describes these items.
- If the organization elected, as permitted under SFAS 116, to report in its revenue statement and balance sheet works of art, historical treasures, or other similar assets held for public exhibition, education, or research in furtherance of public service, provide the following amounts relating to these items:
 

(i) Revenues included in Form 990, Part VIII, line 1	▶ \$ _____
(ii) Assets included in Form 990, Part X	▶ \$ _____
- If the organization received or held works of art, historical treasures, or other similar assets for financial gain, provide the following amounts required to be reported under SFAS 116 relating to these items:
 

a Revenues included in Form 990, Part VIII, line 1	▶ \$ _____
b Assets included in Form 990, Part X	▶ \$ _____

**Part III Organizations Maintaining Collections of Art, Historical Treasures, or Other Similar Assets** (continued)

3 Using the organization's acquisition, accession, and other records, check any of the following that are a significant use of its collection items (check all that apply):

- a  Public exhibition
- b  Scholarly research
- c  Preservation for future generations
- d  Loan or exchange programs
- e  Other \_\_\_\_\_

4 Provide a description of the organization's collections and explain how they further the organization's exempt purpose in Part XIV.

5 During the year, did the organization solicit or receive donations of art, historical treasures, or other similar assets to be sold to raise funds rather than to be maintained as part of the organization's collection?  Yes  No

**Part IV Escrow and Custodial Arrangements.** Complete if organization answered "Yes" to Form 990, Part IV, line 9, or reported an amount on Form 990, Part X, line 21.

1a Is the organization an agent, trustee, custodian or other intermediary for contributions or other assets not included on Form 990, Part X?  Yes  No

b If "Yes," explain the arrangement in Part XIV and complete the following table:

- c Beginning balance
- d Additions during the year
- e Distributions during the year
- f Ending balance

	Amount
1c	
1d	
1e	
1f	

2a Did the organization include an amount on Form 990, Part X, line 21?  Yes  No

b If "Yes," explain the arrangement in Part XIV.

**Part V Endowment Funds.** Complete if the organization answered "Yes" to Form 990, Part IV, line 10.

	(a) Current year	(b) Prior year	(c) Two years back	(d) Three years back	(e) Four years back
1a Beginning of year balance					
b Contributions					
c Net investment earnings, gains, and losses					
d Grants or scholarships					
e Other expenditures for facilities and programs					
f Administrative expenses					
g End of year balance					

2 Provide the estimated percentage of the year end balance held as:

- a Board designated or quasi-endowment ► \_\_\_\_\_ %
- b Permanent endowment ► \_\_\_\_\_ %
- c Term endowment ► \_\_\_\_\_ %

3a Are there endowment funds not in the possession of the organization that are held and administered for the organization by:

- (i) unrelated organizations
- (ii) related organizations

	Yes	No
3a(i)		
3a(ii)		
3b		

b If "Yes" to 3a(ii), are the related organizations listed as required on Schedule R?

4 Describe in Part XIV the intended uses of the organization's endowment funds.

**Part VI Investments - Land, Buildings, and Equipment.** See Form 990, Part X, line 10.

Description of investment	(a) Cost or other basis (investment)	(b) Cost or other basis (other)	(c) Accumulated depreciation	(d) Book value
1a Land				
b Buildings				
c Leasehold improvements				
d Equipment				
e Other		77,579.	36,495.	41,084.
<b>Total.</b> Add lines 1a through 1e. (Column (d) must equal Form 990, Part X, column (B), line 10(c).)				41,084.

**Part VII Investments - Other Securities.** See Form 990, Part X, line 12.

(a) Description of security or category (including name of security)	(b) Book value	(c) Method of valuation: Cost or end-of-year market value
Financial derivatives		
Closely-held equity interests		
Other		
Total. (Col (b) must equal Form 990, Part X, col (B) line 12.) ▶		

**Part VIII Investments - Program Related.** See Form 990, Part X, line 13.

(a) Description of investment type	(b) Book value	(c) Method of valuation: Cost or end-of-year market value
Total. (Col (b) must equal Form 990, Part X, col (B) line 13.) ▶		

**Part IX Other Assets.** See Form 990, Part X, line 15.

(a) Description	(b) Book value
Total. (Column (b) must equal Form 990, Part X, col (B) line 15.) ▶	

**Part X Other Liabilities.** See Form 990, Part X, line 25.

1. (a) Description of liability	(b) Amount
Federal income taxes	
Total. (Column (b) must equal Form 990, Part X, col (B) line 25.) ▶	

2. FIN 48 Footnote. In Part XIV, provide the text of the footnote to the organization's financial statements that reports the organization's liability for uncertain tax positions under FIN 48.

<b>Part XI Reconciliation of Change in Net Assets from Form 990 to Audited Financial Statements</b>	
1 Total revenue (Form 990, Part VIII, column (A), line 12)	1
2 Total expenses (Form 990, Part IX, column (A), line 25)	2
3 Excess or (deficit) for the year. Subtract line 2 from line 1	3
4 Net unrealized gains (losses) on investments	4
5 Donated services and use of facilities	5
6 Investment expenses	6
7 Prior period adjustments	7
8 Other (Describe in Part XIV.)	8
9 Total adjustments (net). Add lines 4 through 8	9
10 Excess or (deficit) for the year per audited financial statements. Combine lines 3 and 9	10

<b>Part XII Reconciliation of Revenue per Audited Financial Statements With Revenue per Return</b>	
1 Total revenue, gains, and other support per audited financial statements	1
2 Amounts included on line 1 but not on Form 990, Part VIII, line 12:	
a Net unrealized gains on investments	2a
b Donated services and use of facilities	2b
c Recoveries of prior year grants	2c
d Other (Describe in Part XIV.)	2d
e Add lines 2a through 2d	2e
3 Subtract line 2e from line 1	3
4 Amounts included on Form 990, Part VIII, line 12, but not on line 1:	
a Investment expenses not included on Form 990, Part VIII, line 7b	4a
b Other (Describe in Part XIV.)	4b
c Add lines 4a and 4b	4c
5 Total revenue. Add lines 3 and 4c. (This must equal Form 990, Part I, line 12.)	5

<b>Part XIII Reconciliation of Expenses per Audited Financial Statements With Expenses per Return</b>	
1 Total expenses and losses per audited financial statements	1
2 Amounts included on line 1 but not on Form 990, Part IX, line 25:	
a Donated services and use of facilities	2a
b Prior year adjustments	2b
c Other losses	2c
d Other (Describe in Part XIV.)	2d
e Add lines 2a through 2d	2e
3 Subtract line 2e from line 1	3
4 Amounts included on Form 990, Part IX, line 25, but not on line 1:	
a Investment expenses not included on Form 990, Part VIII, line 7b	4a
b Other (Describe in Part XIV.)	4b
c Add lines 4a and 4b	4c
5 Total expenses. Add lines 3 and 4c. (This must equal Form 990, Part I, line 18.)	5

**Part XIV Supplemental Information**

Complete this part to provide the descriptions required for Part II, lines 3, 5, and 9; Part III, lines 1a and 4; Part IV, lines 1b and 2b; Part V, line 4; Part X, line 2; Part XI, line 8; Part XII, lines 2d and 4b; and Part XIII, lines 2d and 4b. Also complete this part to provide any additional information

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**SCHEDULE O**  
(Form 990)

Department of the Treasury  
Internal Revenue Service

**Supplemental Information to Form 990**

Complete to provide information for responses to specific questions on  
Form 990 or to provide any additional information.  
▶ Attach to Form 990.

OMB No 1545-0047

**2009**  
Open to Public  
Inspection

Name of the organization

AMERICANS FOR JOB SECURITY

Employer identification number  
52-2062978

FORM 990, PART I, LINE 1, DESCRIPTION OF ORGANIZATION MISSION:

IN WHICH WORKERS HAVE GOOD JOB OPPORTUNITIES AND BUSINESSES CAN THRIVE.

THE ORGANIZATION PROMOTES GOVERNMENTAL POLICY THAT REFLECTS ECONOMIC  
ISSUES OF THE WORKPLACE.

FORM 990, PART VI, SECTION A, LINE 6: THE ORGANIZATION HAS OVER 100

MEMBERS WHICH PAY MEMBERSHIP FEES THAT ARE DEPOSITED INTO THE GENERAL FUND  
AND WILL SUPPORT THE BROAD MISSION AND EFFORTS OF THE ORGANIZATION. THE  
ALLOCATION OF DUES TO THE VARIOUS ACTIVITIES OF THE ORGANIZATION WILL BE  
DETERMINED BY THE PROFESSIONAL STAFF AND THE BOARD OF DIRECTORS.

FORM 990, PART VI, SECTION B, LINE 11: A COPY OF THE FORM 990 IS PRESENTED  
TO THE ORGANIZATION'S PRESIDENT AND BOARD OF DIRECTORS AND IS ALSO REVIEWED  
WITH THE ASSISTANCE OF AN ATTORNEY BEFORE IT IS FILED.

FORM 990, PART VI, SECTION C, LINE 19: THE ORGANIZATION WILL PROVIDE  
COPIES OF EXEMPTION APPLICATION AND THE LAST THREE FORM 990'S. IN  
ADDITION, THE ORGANIZATION WILL ALSO PROVIDE COPIES OF ORGANIZATION  
DOCUMENTS THAT WERE EXHIBITS OR ATTACHMENTS TO THESE DOCUMENTS BUT NOT  
OTHER DOCUMENTS OR POLICIES.

SCH L, PART IV, BUSINESS TRANSACTIONS INVOLVING INTERESTED PERSONS:

(A) NAME OF PERSON: THE NOVEMBER COMPANY

(D) DESCRIPTION OF TRANSACTION: MICHAEL DUBKE IS THE OWNER OF THE  
NOVEMBER COMPANY AND WAS A FORMER PRESIDENT OF AMERICANS FOR JOB SECURITY  
AND NOW PROVIDES MANAGEMENT CONSULTING SERVICES TO THE ORGANIZATION.

**SCHEDULE O**  
(Form 990)

Department of the Treasury  
Internal Revenue Service

**Supplemental Information to Form 990**

Complete to provide information for responses to specific questions on  
Form 990 or to provide any additional information.  
▶ Attach to Form 990.

OMB No 1545-0047

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Name of the organization

**AMERICANS FOR JOB SECURITY**

Employer identification number  
**52-2062978**

**PART VI, SECTION B, LINE 12, 13 & 14**

**THE ORGANIZATION CURRENTLY DOES NOT HAVE A CONFLICT OF INTEREST,  
WHISTLE BLOWER OR WRITTEN DOCUMENT RETENTION AND DESTRUCTION POLICY IN  
EFFECT BUT IS WORKING ON IMPLEMENTING THEM IN FUTURE YEARS.**

**PART VIII, LINE 2A**

**MEMBERSHIP DUES AND VOLUNTARY ASSESSMENTS OF MEMBERS**

**EXHIBIT C**

**The New York Times**

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September 29, 2010

## **Congress Wraps Up Session Early as Midterm Races Loom**

By DAVID M. HERSZENHORN

WASHINGTON — Congress on Thursday adopted a stopgap spending measure to finance the government through Dec. 3 as lawmakers dashed for an earlier-than-expected exodus from Washington and headed home to focus on the midterm elections.

“We may not agree on much, but I think with rare exception all 100 senators want to get out of here and back to their states,” the Senate majority leader, [Harry Reid](#) of Nevada, said Wednesday afternoon. And by 8:30 p.m., most of them were on their way. A half-dozen senators left before the final vote on a motion to adjourn.

The last day of the brief September session was as notable for what did not get done as for what did. Neither chamber voted on the expiring [Bush-era tax cuts](#) as Democrats skipped a politically treacherous debate and Republicans slammed them for it.

In the Senate, the vote on the stopgap spending bill was 69 to 30, with 11 Republicans joining Democrats to approve it. Senator [Russ Feingold](#), Democrat of Wisconsin, and 29 Republicans were opposed. Senator [Lisa Murkowski](#), Republican of Alaska, who is mounting a write-in campaign to keep her job, was absent.

The Senate defeated an amendment proposed by Senator [Jim DeMint](#), Republican of South Carolina, that would have kept the spending measure in force until Feb. 4, preventing Democrats from passing appropriations bills in the lame-duck session set to begin on Nov. 15.

The House vote on the spending resolution, shortly after midnight on Thursday, was 228 to 194. Just one Republican, Anh Cao of Louisiana, joined 227 Democrats in favor; 22 Democrats and 172 Republicans were opposed.

The House on Wednesday gave final approval to an intelligence authorization bill that includes a requirement that the executive branch provide fuller briefings to Congress about covert operations. The bill, which expands the number of lawmakers who would receive such briefings, now goes to [President Obama](#) for his signature.

The House also gave final approval to a bill that authorizes [NASA](#) programs through 2013 and that begins to chart a new future for the space agency.

The bill approved Wednesday was the Senate version of the NASA measure. It represents something of a compromise between the Obama administration, which wants to promote development of a commercial space industry in which private companies would transport astronauts, and House lawmakers, who wanted NASA to build one government-owned rocket, likely the Ares I, to fly to the International Space Station and another, larger one for longer missions.

The bill as adopted cancels the Ares I program but directs NASA to begin development of a heavy-lift rocket for future missions to the moon, asteroids and perhaps Mars. The bill now goes to Mr. Obama for his signature.

House Democratic leaders muscled through legislation to compensate emergency responders and other people who became ill after being exposed to the toxic particles from the Sept. 11 attack in New York, and a bill to give the Obama administration greater leverage to use trade rules to pressure China on its currency policy.

The House did not act on a child nutrition measure that has been a top priority of the first lady, Michelle Obama.

Both the House and Senate had initially planned to be in session through Oct. 8, but with the tense political atmosphere virtually paralyzing the Capitol and lawmakers eager to focus on their re-election campaigns, party leaders adjourned eight days early.

Up until Wednesday, House Democrats had refused to fully rule out a potential vote on the Bush-era tax cuts, which are due to expire at the end of the year.

President Obama and Democratic Congressional leaders want to make the lower tax rates permanent for couples earning up to \$250,000 a year, and individuals earning up to \$200,000. But they want the rates to expire for wealthier Americans on income above those amounts.

Republicans and some Democrats are pushing to extend the lower rates at all levels, at least temporarily, because of the weak economy. Permanently extending the tax breaks for the rich would add \$700 billion to the deficit over 10 years — a cost that Mr. Obama and his economic advisers say is unaffordable.

Some Democrats joined with Republicans in opposing the motions to adjourn, saying that Congress should stay in session to deal with the tax issue.

“The Senate should be more concerned about doing what’s right for the country and less concerned about campaign season,” Senator Michael Bennet of Colorado, one of two Democrats to oppose adjournment, said in a statement.

“The Senate should have brought the extension of key tax cuts to the floor for up or down votes,” Mr. Bennet said, adding that he would push for a one-year extension of the lower rates at all income levels and a longer extension for middle class Americans.

Mr. Bennet is in a fierce battle to hold his seat. The other Democrat to oppose adjournment was Senator [Blanche Lincoln](#) of Arkansas, who is trailing badly in most polls in her own re-election bid.

In the House, 39 Democrats opposed adjournment. The overall vote tally was 210 to 209.

Republicans loudly denounced Democratic leaders for delaying floor action on the expiring tax cuts until after the election.

“Democrats will go campaign to try and save their own jobs while doing nothing to save the jobs of working Americans,” Representative [Mike Pence](#) of Indiana, the No. 3 House Republican said at a news conference. “Congress must not adjourn until we vote up or down to extend all current tax relief to every American.”

The Senate Republican leader, [Mitch McConnell](#) of Kentucky, said that Democrats were far more eager to leave Washington. “They have a unified desire to leave town,” Mr. McConnell said, adding, “We look forward to the fall election.”

**EXHIBIT D**

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NEWS

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Monday September 20, 2010

## Raese, Manchin clash on stimulus

by Ry Rihard  
Daily Mail Capitol Reporter

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Gov. Joe Manchin said the jury is still out on the Obama administration's \$800 billion stimulus package and whether it helped the economy.

But his Republican opponent in the U.S. Senate race, John Raese, said he would not have voted for it if he had been in the Senate last year. Instead, Raese would like to pare government and cut taxes.

Raese said the stimulus money, which many states have used to avoid laying off public employees and cutting services, was "another failure" that put the nation in the hole.

"A lot of times they don't discuss where we got the money," Raese said. "They either have to tax it, or borrow it or inflate the money supply - and they have done a little bit of all of it."

Raese said if he had been governor he would not have taken the state's share of the federal stimulus package. West Virginia's share was about \$1.8 billion.

Democrat Manchin said it's easy for Raese to say no. The governor said that is basically all that Raese ever says.

"I would assume coming from where he's coming from he would be against everything - sure, that's pretty standard, I would think," Manchin said Sunday in an interview

Manchin said he used the stimulus money judiciously. Most states needed the money to prop up their current budgets. That wasn't the case in West Virginia, which is strong in the short-term but faces large shortfalls in coming years.

Some of the money was earmarked for specific programs and thus had to be spent a certain way. But when the governor had discretion, he did what he could to save the money.

Manchin said the same philosophy applied when the state was offered \$55 million from the federal government for education spending.

Manchin agreed to take the money, which must be spent at the discretion of county school boards, only if his office could have more oversight than the federal government originally intended governors to have.

"We're not going to just be throwing money around for the sake of spending it," he said.

Manchin also took Raese to task for his anti-regulation approach.

Raese blames government interventions, including taxes and regulations, for the country's economic problems.

"When government starts to intervene and micromanage, that's why we have our problems," Raese said.

Manchin, by contrast, blames the "greed of Wall Street" for the financial meltdown.

"There has to be checks and balances put there. But I guess he doesn't want anything," Manchin said.

Raese, for instance, opposes the minimum wage law, arguing the market is the best decider of wages. Manchin has used this position against Raese in a recent attack ad.

"The minimum wage is not what got the country in trouble. That shows you the biggest difference he and I have on everything," Manchin said Sunday.

At the same time, Manchin said the Obama administration may have "overcorrected" and "overregulated."

The actual causes of the financial meltdown are now considered to be varied, but the major causes seem to be complex financial deals that looked good only on paper and government-led pushes to keep interest rates low and encourage home ownership, two policies that goosed the market for a collapse.

And the jury is still out on the results of Obama's stimulus. A recent report by the nonpartisan Congressional Budget Office found at least 1.4 million people have jobs they wouldn't have if not for the stimulus.

But conservative economists say those jobs essentially have been taken from the private sector. That's a point Raese vigorously argues and Manchin theoretically endorses.

"To stimulate one sector of the economy is only suppressing other sectors of the economy," Raese said.

Manchin said he would work in the Senate as he worked in the governor's over the past six years. He said his first urge as governor was not to not raise taxes but to make sure existing taxes were being collected and to try to shrink the size of state government by leaving unnecessary positions unfilled as they became vacant.

"We started paying every additional dollar we had down on debt," Manchin said. "That's exactly what this nation has to do. The private sector has to have capital. You can't have our national debt where it is competing with the private sector dollar."

Raese pointed to successful presidents, including Democrat Bill Clinton, who were able to pay down the national debt without heaping on taxes. He said Clinton's approach gave the private sector the reins to grow, which, in turn, filled the treasury's coffers.

"No matter how much money you tax, that's not the problem," Raese said. "The problem is spending."

Mountain Party candidate Jesse Johnson also said he didn't think the stimulus had been very successful. He said it for the most part failed to address structural problems in the U.S. economy by failing to invest in sustainability and research and development.

"I'm not for just continuously printing money or having the Federal Reserve printing money when it's not going to the things that are going to bring us out of this depression or recession or whatever you want to call it," he said.

Johnson added, "We've got to make something. We've got to build something. We've got to ship something. We've got to trade something."

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#### COMMENTS

**EXHIBIT E**

DENVER AND THE WEST

# Buck defeats Norton in bruising GOP primary for Senate seat

**By Allison Sherry**  
*The Denver Post*  
The Denver Post

Posted:08/11/2010 01:00:00 AM MDT

Ken Buck defeated Jane Norton in the GOP primary for U.S. Senate on Tuesday, setting up a general election this fall that pits an establishment Democrat against a scrappy, Tea Party-backed opponent.

Buck's victory over Norton, who garnered early support from the Republican establishment throughout the country and who outraised him by more than \$2 million, was the result of his strength among the state's grass roots.

"We, tonight, have just won the Republican nomination for United States Senate," Buck told a large crowd gathered in Loveland. "Get a good night's sleep, because for the next 83 days we are going to unite the Republican Party."

Norton conceded at about 9:20 p.m., as returns showed her consistently trailing Buck by about 4 percentage points.

The former lieutenant governor told the crowd that while she and Buck traded spirited jabs throughout the primary, "the fact is we agree on far more than we disagree. We agree that Washington is out of control."

She also encouraged her supporters to get some rest because "tomorrow we have to get back to work. . . . We have to take our country back."

Tuesday's victory for Buck was the latest example of a story playing out in the Republican Party nationwide: Tea Party underdog emerges from nowhere and beats the more moneyed, establishment candidate.

Buck rode that Tea Party support, despite a gaffe late last month in which he called Tea Party proponents who question President Barack Obama's birth certificate "dumbasses."

"Ms. Norton didn't spend the time answering questions the way the newly awakened grassroots voters were demanding," said Lu Busse, a 9/12 movement leader. "They

preferred Ken Buck. . . . He got to know them."

Buck was among the lousiest fundraisers among all four Senate candidates, pulling in just \$1 million since the spring of 2009.

But Buck was helped by a Virginia-based group called Americans for Job Security, which spent roughly \$2 million on ads and mailers in Colorado since last winter, many of which were negative about Norton. The group doesn't have to disclose its donors.

Colorado College professor Bob Loevy called Buck's early help with ads the "nationalization of Colorado election campaigns."

"I think the fact that an outside group came in and targeted the former lieutenant governor in the state so strongly and so negatively is further proof to the extent that Coloradans are losing control of their election campaigns," he said.

Norton initially didn't react to the ads, instead focusing her campaign on running against the Democratic incumbent, Sen. Michael Bennet.

But when Buck began to gain national attention in March and April, she replaced her campaign manager with former state Sen. Josh Penry, who took the campaign into attack mode.

On radio, on TV and in numerous debates and forums, Norton capitalized on Buck's gaffes by portraying him as unpolished and uncouth.

Throughout the spring, Norton struggled with embracing her establishment status and her relationship with Arizona Sen. John McCain or distancing herself from it.

She participated in multiple high-dollar fundraisers in Washington, yet, on the campaign trail, often called McCain out for his more moderate stances on immigration and campaign finance. Last weekend, she brought him to Colorado for a fundraiser and a rally in Grand Junction.

But the race was never about star power.

Longmont Republican and Tea Party member Don Nikel, who wore a blue Buck T-shirt and held a "Buck for Colorado" sign at the victory party Tuesday, said he was confident Buck would win. He's heard him speak at several Tea Party events.

"I believe he means what he says. That's kind of refreshing," he said. "I don't see him as what I'd call a typical politician."

*Greeley Tribune staff writer Nate Miller contributed to this report from Loveland. Allison*

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**EXHIBIT F**



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**HEADLINE:** Nonprofits using 'secret money' to fund campaign ads

**BYLINE:** Dan Eggen

**BODY:**

More than a third of the advertising tied to the presidential race has been funded by nonprofit groups that will never have to reveal their donors, suggesting that a significant portion of the 2012 elections will be wrapped in a vast cloak of secrecy.

The bulk of the secret money spent so far has come from conservative groups seeking to propel a Republican into the White House, advertising data show. Millions of dollars in additional spending from both sides has poured into legislative races, such as the Senate contest in Massachusetts, that could help determine which party controls Congress in 2013.

The flow of funds is part of a wave of spending by outside groups - particularly super PACs, which have few limits on their activities - that has quickly come to dominate the 2012 presidential contest.

But unlike super PACs, politically minded nonprofit groups are under no obligation to disclose the corporations, unions or wealthy tycoons bankrolling their advertising, much of which is almost indistinguishable from regular political ads run by campaigns.

The result is a race heavily influenced by such organizations and their funders, who will remain largely in the shadows.

"I don't think we've seen these kind of groups acting so aggressively in election-related activity as we see now," said Richard Hasen, an election law expert at the University of California at Irvine. "This is pure secret money. . . . The goal is to avoid disclosure."

Nonprofit "social welfare" organizations and other tax-exempt groups with confidential donors have spent more than \$24 million in the 2012 cycle on political ads naming President Obamaor, less frequently, his Republican rivals,

## Nonprofits using 'secret money' to fund campaign ads The Washington Post February 7, 2012 Tuesday

according to a Washington Post analysis of data supplied by Kantar Media-CMAG, which tracks ad spending. That accounts for about 40 percent of the money estimated to have been spent on advertising related to the presidential candidates.

Crossroads GPS, a nonprofit group backed by GOP political guru Karl Rove, has spent more than \$10 million on ads targeting Obama over the federal deficit, energy policies and other issues in the 2012 cycle. American Crossroads, a sister group registered as a super PAC, has spent just \$133,000 on such ads, the data show.

The disparity means that nearly all of the broadcast messages that voters have encountered from the Crossroads groups were paid for by persons unknown. The super PAC side of the operation reported taking in \$18.2 million in 2011, including \$7 million from Texas billionaire Harold Simmons and his company; the nonprofit side raised almost twice as much from unidentified donors.

For donors, 'a choice'

Spokesman Jonathan Collegio said Crossroads GPS is no different than tens of thousands of other nonprofits, from ideological groups to charities, that are entitled to keep their contributors confidential.

"Private organizations don't have to disclose their donor lists to the government at their beck and call," Collegio said. "Those who want to support the Crossroads groups have a choice of whether they want to give to a more political- or issue-oriented effort, and they make their decisions according to their tastes and preferences."

Another top spender is Americans for Prosperity, a Washington-based group that has ties to two conservative brothers who run the Koch Industries oil-and-gas conglomerate; David Koch is chairman of the group's foundation.

Americans for Prosperity has spent nearly \$7 million on ads targeting Obama, including a spot criticizing his administration's handling of a government loan guarantee to failed solar firm Solyndra; the spot prompted a response ad from the Obama campaign. Tim Phillips, Americans for Prosperity's president, said he expects that the organization will exceed \$50 million in total spending, including ads and grass-roots organizing, in 2012.

Phillips defended the ability to keep donors under wraps, saying that the group "works in the public policy arena more than the political arena." He also cited concerns that donors could be targeted for harassment by the Obama administration and liberal groups.

"This administration, and politicians in general, want to seek retribution with people who disagree with them," Phillips said.

Obama has complained loudly about the influence of "secret billionaires" on the political system, and Senate Democrats are reviving efforts to force disclosure by nonprofit groups that run political ads.

But Democrats also enjoy support from many groups that rely on undisclosed contributors, including unions and environmental groups. Two super PACs helping Democrats in 2012, American Bridge 21st Century and Priorities USA Action, have each accepted transfers of more than \$200,000 from their nonprofit arms - meaning that a portion of their budgets were effectively paid for by secret donors.

American Bridge officials said its \$246,000 transfer covered administrative expenses under a cost-sharing agreement between the sister groups. Priorities USA did not respond to a request for comment.

Unlimited dollars

A general surge in spending by outside groups, first seen during the 2010 elections, is due in part to a series of court rulings, including *Citizens United v. Federal Election Commission*, that have made it easier for corporations and wealthy individuals to spend unlimited amounts of money on elections.

That environment led to the rise of super PACs - more than 300 are now registered with the FEC - that can raise and spend unlimited amounts as long as they do not coordinate directly with candidates. The catch is that such PACs must disclose their donors - leading an increasing number of publicity-shy contributors to use nonprofits to cloak their political spending, experts say.

Under U.S. tax laws, certain types of nonprofit groups can keep contributors confidential as long as their "primary purpose" is not politics, a definition that is the focus of fierce dispute in legal circles. The Internal Revenue Service has been cautious about treading too heavily, leaving many groups to, in effect, police themselves, many experts say.

## Nonprofits using 'secret money' to fund campaign ads The Washington Post February 7, 2012 Tuesday

The rule of thumb for social-welfare groups, business groups and other nonprofits is that they must spend less than half their budget on election activities to avoid disclosure of donors. Many nonprofits contend that that leaves them free to spend the rest of their budget on "issue ads," which often include scathing and pointed attacks on individual politicians but don't explicitly tell viewers how to vote.

Crossroads GPS - which is awaiting IRS approval of its nonprofit status - is currently on the air with an ad attacking Obama for the administration's loan guarantee to Solyndra, calling it a "big-government fiasco" that left "laid-off workers forgotten." But the ad never urges viewers to vote a certain way.

"Tell President Obama we need jobs, not more insider deals," the spot concludes.

Donald Tobin, a tax-law professor at Ohio State University's Moritz College of Law, said political advocacy groups are taking advantage of a murky legal landscape between tax and election laws.

He argues that many of the social-welfare groups now spending big on campaigns are flouting the intent of tax laws, which did not envision groups formed solely to dance on the line between issue advocacy and direct participation in elections.

"There's no way that Congress expected groups like Crossroads GPS to be social-welfare organizations," Tobin said. "They used to be groups that were focused on social welfare and did a little politics on the side. This has turned that idea on its head."

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Staff writer T.W. Farnam contributed to this report.

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